

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ANDREW CORZO, et al. individually and on behalf of all others similarly situated, <i>Plaintiffs,</i> v. BROWN UNIVERSITY, et al., <i>Defendants.</i>	Case No. 1:22-cv-00125 Hon. Matthew F. Kennelly
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**[PROPOSED] ORDER GRANTING CERTAIN DEFENDANTS' MOTION TO
COMPEL RESPONSES TO DEFENDANTS' SECOND SET OF INTERROGATORIES**

The Court enters the following Order regarding the Motion to Compel Responses to Defendants' Second Set of Interrogatories submitted by Defendants California Institute of Technology, Cornell University, Georgetown University, the Johns Hopkins University, Massachusetts Institute of Technology, the University of Notre Dame, and the Trustees of the University of Pennsylvania.

1. Defendants' Motion to Compel is granted, and Plaintiffs are directed to supplement their responses to the following interrogatories within fourteen (14) days of this order:

2. **Interrogatories 7-22, 24-25, 27-28, 30-31, 33-34, 36-37, 39-44:** These interrogatories are reasonable in scope and not premature, given the advanced stage of discovery in this case. To the extent that Plaintiffs object to these interrogatories as "premature contention interrogatories," that objection is overruled. Plaintiffs are directed to provide complete responses to these interrogatories within fourteen (14) days of this order.

3. **Interrogatories 11, 13, 14, 16, 20 and 44:** Plaintiffs' objection that these interrogatories seek "premature expert discovery" is overruled. Plaintiffs are directed to provide complete responses to these interrogatories within fourteen (14) days of this order.

4. **Interrogatories 15, 18-19, 21-22, 24-25, 27-28, 30-31, 33-34, 36-37, 39, and 40:** Plaintiffs' responses to these interrogatories improperly incorporate other responses by reference—they are not complete in and of themselves, as the Rules require. Accordingly, Plaintiffs are directed to provide complete responses to these interrogatories within fourteen (14) days of this order, and to refrain from incorporating by reference in their forthcoming supplemental responses.

5. **Interrogatories 7 and 15:** Plaintiffs' responses to these interrogatories improperly rely on Rule 33(d). The interrogatories seek information relating to Plaintiffs' beliefs and contentions, and Defendants cannot reasonably ascertain that information from a compilation of Defendants' own documents. Plaintiffs are directed to answer these interrogatories in full within fourteen (14) days of this order. Plaintiffs' responses must explain the relevance of any document cited and provide a specific citation to the relevant portion of any cited document.

SO ORDERED:

Dated: _____

Hon. Matthew F. Kennelly
United States District Judge